

Dan Lawton (State Bar No. 127342)  
Joseph C. Kracht (State Bar No. 228507)  
LAWTON LAW FIRM  
Emerald Plaza  
402 West Broadway, Suite 1330  
San Diego, CA 92101  
(619) 595-1370 (Telephone)  
(619) 595-1520 (Telefacsimile)  
Email: dan@lawtonlaw.com; joe@lawtonlaw.com

Justin G. Reden (State Bar No. 230068)  
Todd J. Langford (State Bar No. 254517)  
REDEN & REDEN, APC  
16885 Via Del Campo Court, Suite 320  
San Diego, CA 92127  
(619) 758-3869 (Telephone)  
(800) 746-5015 (Telefacsimile)  
Email: jreden@redenandreden.com; tlangford@redenandreden.com

Attorneys for Plaintiff and Counterdefendant Security5, LLC

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

SECURITY5, LLC, a Delaware limited  
liability company,

Plaintiff,

v.

REACT MOBILE LLC, a Washington  
limited liability company; REACT  
MOBILE, INC., a Delaware corporation;  
and DOES 1 through 100, inclusive,

Defendants.

REACT MOBILE, LLC, a Washington  
limited liability company; REACT  
MOBILE, INC., a Delaware corporation

Counterclaimants,

v.

SECURITY5, LLC, a Delaware limited  
liability company,

Counterdefendant.

Case No. 16-CV-02004-DMS-RBB

JOINT MOTION TO DISMISS CASE  
WITHOUT PREJUDICE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

TO THIS HONORABLE COURT:

Plaintiff and counterdefendant Security5, LLC and defendants and counterclaimants React Mobile, LLC and React Mobile, Inc. hereby jointly move the Court to dismiss this action in its entirety *without prejudice*.

The parties have agreed to settle and compromise their respective claims. A condition of their settlement agreement requires the case be dismissed without prejudice.

For that reason, the parties respectfully request the Court grant this motion and order the case dismissed without prejudice.

Respectfully submitted,

Dated: May 1, 2017

By: s/Dan Lawton  
DAN LAWTON  
Attorneys for Plaintiff Security5, LLC

Dated: May 1, 2017

By: s/Thomas E. Moore III  
THOMAS E. MOORE III  
Attorneys for Defendants React Mobile, LLC and React Mobile, Inc.